

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

BLACKBAUD, INC., et al.,

Defendants.

Civil Action No. 24-03993-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

HIYA, INC., et al.,

Defendants.

Civil Action No. 24-04000-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

ACXIOM, LLC, et al.,

Defendants.

Civil Action No. 24-04017-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

COMMERCIAL REAL ESTATE
EXCHANGE, INC., et al.,

Defendants.

Civil Action No. 24-04073-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

CARCO GROUP INC., et al.,

Defendants.

Civil Action No. 24-04077-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

TWILIO, INC., et al.,

Defendants.

Civil Action No. 24-04095-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

6SENSE INSIGHTS, INC., et al.,

Defendants.

Civil Action No. 24-04104-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

LIGHTBOX PARENT, L.P., et al.,

Defendants.

Civil Action No. 24-04105-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

SEARCH QUARRY, LLC, et al.,

Defendants.

Civil Action No. 24-04106-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

ENFORMION, et al.,

Defendants.

Civil Action No. 24-04110-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

COSTAR GROUP, INC., et al.,

Defendants.

Civil Action No. 24-04111-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

ORACLE INTERNATIONAL
CORPORATION, et al.,

Defendants.

Civil Action No. 24-04112-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

RED VIOLET, INC., et al.,

Defendants.

Civil Action No. 24-04113-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

RE/MAX, LLC, et al.,

Defendants.

Civil Action No. 24-04114-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

EPSILON DATA MANAGEMENT, LLC, et
al.,

Defendants.

Civil Action No. 24-04168-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

PEOPLE DATA LABS, INC., et al.,

Defendants.

Civil Action No. 24-04171-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

CLARITAS, et al.,

Defendants.

Civil Action No. 24-04175-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

DATA AXLE, INC., et al.,

Defendants.

Civil Action No. 24-04181-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

REMINE, INC., et al.,

Defendants.

Civil Action No. 24-04182-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

LUSHA SYSTEMS, INC., et al.,

Defendants.

Civil Action No. 24-04184-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

TELTECH SYSTEMS, INC., et al.,

Defendants.

Civil Action No. 24-04217-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

PEOPLECONNECT, INC., et al.,

Defendants.

Civil Action No. 24-04227-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

CORELOGIC, INC., et al.,

Defendants.

Civil Action No. 24-04230-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

BLACK KNIGHT TECHNOLOGIES, LLC,
et al.,

Defendants.

Civil Action No. 24-04233-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

THOMSON REUTERS CORPORATION, et
al.,

Defendants.

Civil Action No. 24-04269-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

CHOREOGRAPH LLC, et al.,

Defendants.

Civil Action No. 24-04271-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

TRANSUNION, LLC, et al.,

Defendants.

Civil Action No. 24-04288-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

EQUIFAX, INC., et al.,

Defendants.

Civil Action No. 24-04298-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

SPOKEO, INC., et al.,

Defendants.

Civil Action No. 24-04299-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

TELNYX LLC, et al.,

Defendants.

Civil Action No. 24-04354-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

MYHERITAGE, LTD, et al.,

Defendants.

Civil Action No. 24-04392-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

WILAND, INC., et al.,

Defendants.

Civil Action No. 24-04442-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

VALASSIS DIGITAL CORP., et al.,

Defendants.

Civil Action No. 24-04770-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

ATDATA, LLC, et al.,

Defendants.

Civil Action No. 24-04447-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

PRECISELY HOLDINGS, LLC, ET AL., et
al.,

Defendants.

Civil Action No. 24-04571-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

OUTSIDE INTERACTIVE, INC., et al.,

Defendants.

Civil Action No. 24-04696-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

THE LIFETIME VALUE CO. LLC, ET AL.,
et al.,

Defendants.

Civ. Action No. 24-04850-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

FIRST AMERICAN FINANCIAL
CORPORATION ET AL, et al.,
Defendants.

Civ. Action No. 24-05334-HB

ATLAS DATA PRIVACY
CORPORATION, et al.

Plaintiffs,

v.

LEXISNEXIS RISK DATA
MANAGEMENT, LLC, et al.,
Defendants.

Civil Action No. 24-06160-HB

**DECLARATION OF ANGELO A. STIO III IN SUPPORT OF
DEFENDANTS' BRIEF IN OPPOSITION TO PLAINTIFFS'
CONSOLIDATED MOTION TO REMAND**

ANGELO A. STIO III, being of full age, being duly sworn according to law upon his oath, deposes and says:

1. I am an attorney-at-law of the State of New Jersey and a partner with the law firm Troutman Pepper Hamilton Sanders LLP, attorneys for the following defendants who are subject to the Consolidated Motion for Remand: Acxiom LLC (Case No. 24-04017-HB), AtData LLC, Carco Group Inc. (Case No. 24-04077-HB), CoreLogic, Inc. (Case No. 24-04230-HB), Enformion, LLC (Case No. 24-04110-HB), Enformion Holdco Inc. (Case No. - 24-04110-HB), Intellicorp Records, Inc. (Case No. 24-04077-HB), Red Violet, Inc. (Case No. 24-04113-HB), and Remine Inc. (Case No. 24-04182-HB).

2. I submit this Declaration in support of the Defendants' Consolidated Brief in Opposition to Plaintiffs' Consolidated Motion to Remand. Unless otherwise noted, I have personal knowledge of the facts set forth in this Declaration.

3. Attached hereto as **Exhibit 1** are excerpts from the transcript from the July 30, 2024 deposition of Plaintiff Atlas Data Privacy Corporation's corporate designee, Matthew Adkisson. An unredacted version of Exhibit 1 is being temporarily filed **UNDER SEAL** in accordance with Local Civ. Rule 5.3(c)(4) to

accommodate Plaintiffs' request to claim confidentiality over information contained in the documents.

4. Attached hereto as **Exhibit 2** is a copy of the Third Certificate of Amendment to the Amended and Restated Certificate of Incorporation of RoundRobin Corporation.

5. Attached hereto as **Exhibit 3** is a copy of the Certificate of Authority for Atlas Data Privacy Corporation ("Atlas"), which registers Atlas to do business in the State of New Jersey.

6. Attached hereto as **Exhibit 4** is a copy of the Atlas Privacy Order Form entered into between Atlas and the New Jersey State Police Benevolent Association, Inc. Exhibit 4 is being temporarily filed **UNDER SEAL** in accordance with Local Civ. Rule 5.3(c)(4) to accommodate Plaintiffs' request to claim confidentiality over information contained in the document.

7. Attached hereto as **Exhibit 5** is a copy of the Atlas Privacy Order Form that was produced in discovery and entered into between Atlas and the New Jersey State Troopers Fraternal Association. Exhibit 5 is being temporarily filed **UNDER SEAL** in accordance with Local Civ. Rule 5.3(c)(4) to accommodate Plaintiffs' request to claim confidentiality over information contained in the document.

8. Attached hereto as **Exhibit 6** is a copy of the Atlas Privacy Order Form that was produced in discovery and entered into between Atlas and the New Jersey State Police Benevolent Association Local 105. Exhibit 6 is being temporarily filed **UNDER SEAL** in accordance with Local Civ. Rule 5.3(c)(4) to accommodate Plaintiffs' request to claim confidentiality over information contained in the document.

9. Attached hereto as **Exhibit 7** is a copy of a chart listing the Defendants who are subject to Plaintiffs' Consolidated Motion for Remand.

10. Attached hereto as **Exhibit 8** is a copy of a letter from Patrick Colligan to the members of the PBA, which was published in Jersey State Benevolent Association Local 105 on April 5, 2023.

11. Attached hereto as **Exhibit 9** is a copy of Atlas's Daniel's Law Service Terms, which were last updated on November 18, 2022. Exhibit 9 is being temporarily filed **UNDER SEAL** in accordance with Local Civ. Rule 5.3(c)(4) to accommodate Plaintiffs' request to claim confidentiality over information contained in the document.

12. Attached hereto as **Exhibit 10** is a copy of Atlas' Daniel's Law Service Terms, which were last updated on January 23, 2023. Exhibit 10 is being temporarily filed **UNDER SEAL** in accordance with Local Civ. Rule 5.3(c)(4) to

accommodate Plaintiffs' request to claim confidentiality over information contained in the document.

13. Attached hereto as **Exhibit 11** is a copy of Atlas' Daniel's Law Service Terms, which were last updated on August 6, 2023. Exhibit 11 is being temporarily filed **UNDER SEAL** in accordance with Local Civ. Rule 5.3(c)(4) to accommodate Plaintiffs' request to claim confidentiality over information contained in the document.

14. Attached hereto as **Exhibit 12** is a true and correct copy of Atlas' Daniel's Law Service Terms, which were last updated on February 4, 2024 and which were produced in discovery and are attached as Exhibit E to the Certification of Rajiv D. Parikh in Support of Plaintiffs' Consolidated Motion to Remand.

15. Attached hereto as **Exhibit 13** is a copy of an excerpt of the Covered Persons List With Dates of Assignments, produced by Atlas in discovery pursuant to the Court's June 3, 2024 Order on Defendant Enformion, LLC, Case No. 1:24-cv-4110 (ATLAS-ENFOR_00000016). The full document from which Exhibit 13 was excerpted was produced in native Excel format. Exhibit 13 is voluminous. Defendants will make the entire native document available for review if the Court requests it. Exhibit 13 is being temporarily filed **UNDER SEAL** in accordance with Local Civ. Rule 5.3(c)(4) to accommodate Plaintiffs' request to claim confidentiality over information contained in the document.

16. Attached hereto as **Exhibit 14** is a copy of a template of an Assignment Confirmation that Atlas claims was sent to its purported assignors beginning February 5, 2024. Exhibit 14 is being filed **UNDER SEAL** in accordance with Local Civ. Rule 5.3(c)(4) to accommodate Plaintiffs' request to claim confidentiality over information contained in the document.

17. Attached hereto as **Exhibit 15** is a copy of a June 24, 2024 letter from Rajiv D. Parikh, Esq. to Angelo A. Stio, Esq. as counsel of record for defendants represented by Troutman Pepper Hamilton Sanders LLP.

18. Attached hereto as **Exhibit 16** is a copy of excerpts of the transcript of the May 7, 2024 proceedings before the Court.

19. By temporarily filing the exhibits **UNDER SEAL**, Defendants do not admit that the information in the exhibits is confidential. Defendants reserve the right to challenge Plaintiffs' confidentiality designations at the appropriate time.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 9, 2024

/s/ Angelo A. Stio III
Angelo A. Stio III